



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

April 7, 2009

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VIA CERTIFIED MAIL 7002 0510 0002 5825 2892

Mr. Robert H. Lange
U. S. Steel, Gary Works
1 North Broadway
Gary, IN 46402

RE: Referral to USEPA, Region 5
U.S. Steel, Gary Works
Plant ID Number: 089-00121
Gary, Lake County

Dear Mr. Lange:

The Third (3rd) Quarter 2008 Reports (July 1, 2008 through September 30, 2008) submitted by you on October 17, 2008, identified the following deviations:

- (1) Permit Condition D.2.4(e)(1): On July 02, 2008 the allowable visible emissions for coke oven offtake leaks (5%) was exceeded (6.7%) during compliance monitoring on No.2 Coke Battery.
- (2) Permit Condition D.2.4(a) and D.2.5(e): On July 16, 2008 the allowable visible emissions for coke oven door (10%) was exceeded (12.7%) during compliance monitoring on No.7 Coke Battery.
- (3) Permit Condition D.2.26 On July 25, 2008 You must be in compliance with the emissions limitations, work practice standards, and operation and maintenance requirements in this subpart at all times, except during periods of startup, shutdown and malfunction as defined by 63.2.
- (4) Permit Condition D.2.4(c)(2): On August 12, 2008 the allowable visible emissions for coke oven pushes (20% opacity) was exceeded (32.5%) during compliance monitoring on No. 2 Coke Battery.
- (5) Permit Condition D.2.4(e)(1): On August 27, 2008 the allowable visible emissions for coke oven offtake leaks (5%) was exceeded (7.3%) during compliance monitoring on No.2 Coke Battery.
- (6) Permit Condition D.2.4(e)(1): On September 02, 2008 the allowable visible emissions for coke oven offtake leaks (5%) was exceeded (6.8%) during compliance monitoring on No.2 Coke Battery.
- (7) Permit Condition D.2.4(e)(1): On September 04, 2008 the allowable visible emissions for coke oven offtake leaks (5%) was exceeded (5.6%) during compliance monitoring on No.2 Coke Battery.

Mr. Robert H. Lange
U. S. Steel, Gary Works

Page 2


- (8) Permit Condition D.2.4(e)(1): On September 05, 2008 the allowable visible emissions for coke oven offtake leaks (5%) was exceeded (5.6%) during compliance monitoring on No.2 Coke Battery.

The Fourth (4th) Quarter 2008 Reports (October 1, 2008 through December 31, 2008) submitted by you on January 22, 2009, identified the following deviations:

1. Permit Condition D.2.4(a) and D.2.5(e): On December 20, 2008 the allowable visible emissions for coke oven door (10%) was exceeded (12.0%) during compliance monitoring on No.5 Coke Battery.

This matter has been referred to USEPA, Region 5 for appropriate action. If formal action is initiated, you will be issued a notice of violation informing you of how to proceed in resolving this matter. Please direct any response to this letter and any questions to Dave Sampias at 219/757-0291.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Robert Simmons", with a long horizontal flourish extending to the right.

J. Robert Simmons
Deputy Director
Northwest Regional Office

JRS/dcs
ACES No. 99092
cc: Office of Air Quality Enforcement Section
File

III. CASE INFORMATION

A.	Date of Inspection(s) or Review(s) Prompting This Referral: 2008 3rd rd and 4th Quarter Reports	Planned Follow-up Date(s): N/A
B.	Referral is the Result of a Multi-Media Inspection: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C.	Inspector or Program Contact Person (If different from person making this referral):	
D.	Impacted Area: Ambient Air	
E.	Violation Classification (If applicable) <input type="checkbox"/> R.E.R. <input type="checkbox"/> SNC/HPV <input type="checkbox"/> Complaint <input checked="" type="checkbox"/> Non-Attainment Area	

F.	Specific Violations (Does not need to be completed for Hazardous Waste cases):		
	<u>DATE OF VIOLATION</u>	<u>STATE / FEDERAL – IC, IAC, PERMIT CONDITION VIOLATED</u>	<u>VIOLATION DESCRIPTION</u>
	July 02, 2008	Permit Condition D.2.4(e)(1): the allowable visible emissions for coke oven offtake piping (5%) was exceeded (6.7%) No. 2 Coke Battery.	No visible emissions shall be permitted from more than five percent (5%) of observed battery offtakes
	July 16, 2008	Permit Condition D.2.4(a), D.2.5(e): the allowable visible emissions for coke oven door (10%) was exceeded (12.7%) No. 7 Coke Battery.	No visible emissions shall be permitted from more than ten percent (10%) of observed battery doors.
	July 25, 2008	Permit Condition D.2.26 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Ovens; Pushing, Quenching and Battery Stacks 40 CFR 63, Subpart CCCCC	You must be in compliance with the emission limitations, work practice standards, and operation and maintenance requirements in this subpart at all times, except during periods of startup, shutdown, and malfunction as defined by 63.2
	August 12, 2008	Permit Condition D.2.4 (c) (2) the allowable visible emissions for coke oven pushes (20% opacity) was exceeded (32.5%) during compliance monitoring on No. 2 Coke Battery.	Emissions during the pushing operation shall not exceed twenty percent (20%) opacity. Six (6) consecutive readings shall be averaged to determine opacity.
	August 27, 2008	Permit Condition D.2.4(e)(1): the allowable visible emissions for coke oven offtake piping (5%) was exceeded (7.3%) No. 2 Coke Battery.	No visible emissions shall be permitted from more than five percent (5%) of observed battery offtakes
	September 02, 2008	Permit Condition D.2.4(e)(1): the allowable visible emissions for coke oven offtake piping (5%) was exceeded (6.8%) No. 2 Coke Battery.	No visible emissions shall be permitted from more than five percent (5%) of observed battery offtakes
	September 04, 2008	Permit Condition D.2.4(e)(1): the allowable visible emissions for coke oven offtake piping (5%) was exceeded (5.6%) No. 2 Coke Battery.	No visible emissions shall be permitted from more than five percent (5%) of observed battery offtakes
	September 05, 2008	Permit Condition D.2.4(e)(1): the allowable visible emissions for coke oven offtake piping (5%) was exceeded (5.6%) No. 2 Coke Battery.	No visible emissions shall be permitted from more than five percent (5%) of observed battery offtakes.
	December 20, 2008	Permit Condition D.2.4(a), D.2.5(e): the allowable visible emissions for coke oven door (10%) was exceeded (12.7%) No. 7 Coke Battery.	No visible emissions shall be permitted from more than ten percent (10%) of observed battery doors.
G.	Describe the events, routine inspections, etc., that led up to or supported the discovery of the violation(s): Method 303 inspections as well as a review of the 3rd and 4th Quarter Reports.		

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: U.S. Steel – Gary Works
Source Address: One North Broadway, Gary, Indiana 46402
Mailing Address: One North Broadway, Gary, Indiana 46402
Part 70 Permit No.: T089-7663-00121

Months: July 1 to September 30 Year: 2008

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input checked="" type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
Permit Requirement (specify permit condition #) D.2.4(e)(1) and D.2.5(c)	
Date of Deviation: 7/2/08	Duration of Deviation: Not applicable
Number of Deviations: 1	
Probable Cause of Deviation: 6 offtake leaks out of 90 observed <i>303 #2 BATTERY 6.70%</i>	
Response Steps Taken: Patch and seal leaks on the leaking offtakes	
Permit Requirement (specify permit condition #) D.2.4(a) and D.2.5(e)	
Date of Deviation: 7/16/08	Duration of Deviation: Not applicable
Number of Deviations: 1	
Probable Cause of Deviation: 19 door leaks out of 150 observed <i>#7 BATTERY 12.70% commitment</i>	
Response Steps Taken: Seal leaks on the leaking doors	



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INSPECTION SUMMARY

DATE 7-2-08 INSPECTOR C. Swallow SHIFT A

PLANT: CITIZENS GAS (Indianapolis) ☐ MITTAL (Burns Harbor) ☐ US STEEL (Gary) ☒

BATTERY NO.: 1 ☐ 2 ☒ 5 ☐ 7 ☐ E ☐ H ☐

Inspection Times		Inspection Data		Percent Leakage Calculations	
Start	Finish				
<u>2223</u>	<u>2228</u>	# Ovens Out of Service = <u>7</u>	PS Doors Leaking = <u>0</u>	No. Door Leaks No. Doors Observed	<u>1.06</u> % Leakage
		# Doors Not Observed = <u>6</u>	CS Doors Leaking = <u>1</u>	Door Inspection Limit _____ % for 30 day rolling average	
		Total # Doors Obs. = <u>94</u>	Total Leaking Doors = <u>1</u>	PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
<u> </u>	<u> </u>	Total # Collector Main Leaks Observed = <u> </u>			
<u>2235</u>	<u>2237</u>	# Ovens Out of Service = <u>7</u>	Total Leaking Lids = <u>0</u>	No. Lid Leaks No. Lids Observed	<u>0</u> % Leakage
		# Lids Not Observed = <u>80</u>		Lid Inspection Limit _____ % for 30 day rolling average	
		# Lids Observed = <u>180</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
<u>2231</u>	<u>2235</u>	# Ovens Out of Service = <u>7</u>	Total Leaking Offtakes = <u>6</u>	No. Offtake Leaks No. Offtakes Observed	<u>0.67</u> % Leakage
		# Offtakes Not Observed = <u>10</u>		Offtake Inspection Limit _____ % for 30 day rolling average	
		# Offtakes Observed = <u>90</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
<u>2244</u>	<u>2246</u>	Seconds Per Charge / Oven No.	Total Seconds for Five Charges = <u>45.0</u>	Charging Inspection	
		1. <u>9.0</u> / <u>8</u>		Limit = 60 Second for five charges	
		2. <u>9.0</u> / <u>10</u>		(Log for 30 day rolling average)	
		3. <u>8.0</u> / <u>12</u>	6. _____ / _____		
		4. <u>9.5</u> / <u>14</u>			
		5. <u>9.5</u> / <u>16</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	



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TOPSIDE INSPECTION (LIDS & OFFTAKES)

DATE 7-2-08

INSPECTOR CSwellow

PLANT: CITIZENS GAS (Indianapolis) ☐ MITTAL (Burns Harbor) ☐ US STEEL (Gary) ☒

BATTERY NO.: 1 ☐ 2 ☒ 5 ☐ 7 ☐ E ☐ H ☐

Oven No.	OFFTAKES		LIDS					Oven No.	OFFTAKES		LIDS					Oven No.	OFFTAKES		LIDS				
	Push Side	Coke Side	1	2	3	4	5		Push Side	Coke Side	1	2	3	4	5		Push Side	Coke Side	1	2	3	4	5
1	00							32								63							
2								33								64							
3	X							34								65							
4								35	X							66							
5								36								67							
6								37								68							
7								38								69							
8	0	0	-	0	0	-		39								70							
9								40								71							
10	0	0	-	-	-	-		41	0	0	0	-	0	0		72							
11								42								73							
12	0	0	-	0	0	-		43	X	X						74							
13								44								75							
14	0	0	-	0	0	-		45								76							
15								46	X							77							
16								47								78							
17								48								79							
18								49								80							
19								50								81							
20								51								82							
21								52								83							
22								53								84							
23	005							54	005							85							
24								55								86							
25								56								87							
26								57	X							88							
27	005							58								89							
28								59								90							
29								60								91							
30								61								92							
31								62								93							

Lids Traverse:

Start Time 2235

Stop Time 2237

Total Number of Ovens 57

Maximum Time (sec) 228

Actual Time 88

Valid Run ☒ Y ☐ N

Ovens Out of Service 7

Offtakes Traverse:

Start Time 2231

Stop Time 2235

Maximum Time (sec) 288

Actual Time 143

Valid Run ☒ Y ☐ N

OFFTAKES		LIDS		Legend
Total No. of Offtakes	<u>114</u>	Total No. of Lids	<u>228</u>	
No. of Offtakes Not Observed	<u>10</u>	No. of Lids Not Observed	<u>20</u>	
Total No. of Offtakes Observed	<u>90</u>	Total No. of Lids Observed	<u>180</u>	
No. of Offtakes Leaking	<u>6</u>	No. of Lids Leaking	<u>0</u>	
				X = Leak
				OOS = Out-Of-Service
				O = Open

Comments: _____

92337

Battery Number

5 ☐ 7 ☒

Date: 7/16/08

705 7.5 6.1
785 6.2 5.8

Inspector's Name: _____

Sky Condition:

Ambient Temperature

Push Side Traverse Start Time 1201 Stop Time 1203
 Coke Side Traverse Start Time 1209 Stop Time 1212

Oven No.	Push Side	Coke Side
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

Oven No.	Push Side	Coke Side
26		
27		
28		
29		
30		
31		
32		
33		
34		
35		
36		
37		
38		
39		
40		
41		
42		
43		
44		
45		
46		
47		
48		
49		
50		
51		

Oven No.	Push Side	Coke Side
52		
53		
54		
55		
56		
57		
58		
59		
60		
61		
62		
63		
64		
65		
66		
67		
68		
69		
70		
71		
72		
73		
74		
75		
76		
77		

$$\frac{\text{No. Door Leaks}}{\text{No. Doors Observed}} \times 100 = \text{Percent Leakage}$$
$$\frac{19}{150} \times 100 = 12.7\% \text{ Leakage}$$

LIMIT PER 326 IAC 6-1-10.2 (c)(1)
10% of the Observed Coke Oven Doors

Compliance Status: ☐ IN ☒ OUT

Permit Requirement (specify permit condition #) D.2.26	
Date of Deviation: 7/25/08	Duration of Deviation: Not applicable
Number of Deviations: 1	
Probable Cause of Deviation: No. 7 Coke Battery shutdown was on July 18, 2008 due to a scheduled waste heat stack canal repair. The ovens were charged and collector mains pressured with steam and nitrogen. The purge medium burned away the carbon buildup and the cracks and joints in the oven chambers were opened resulting in raw coke oven gas to penetrate the heating flues after recharging.	
Response Steps Taken: Adjusted draft setting and air to gas ratio for normal operations, inspected oven walls and floors for spraying, ceramic welding, and dry gunning.	

Permit Requirement (specify permit condition #) D.2.4(c)(2)	
Date of Deviation: 8/12/08	Duration of Deviation: Not applicable
Number of Deviations: 1	#2 Battery Pushing 32.5% Due 30.5%
Probable Cause of Deviation: The deterioration of the walls and flues due to ram forces exerted on the walls over time along with water running down onto the first through third flues for 41 and 42 which led to low temperatures on the fourth control flue.	
Response Steps Taken: Inspected flues for 41 and 42 oven walls, gas channels and waste heat elbows. Repaired the leaking water pipe and swab 41 and 42 pusher side and coke side guns.	

Permit Requirement (specify permit condition #) D.2.4(e)(1) and D.2.5(c)	
Date of Deviation: 8/27/08	Duration of Deviation: Not applicable
Number of Deviations: 1	#2 Battery 30.3 Insects 7.3%
Probable Cause of Deviation: 7 offtake leaks out of 96 observed	
Response Steps Taken: Patch and seal leaks on the leaking offtakes	

Permit Requirement (specify permit condition #) D.2.4(e)(1) and D.2.5(c)	
Date of Deviation: 9/2/08	Duration of Deviation: Not applicable
Number of Deviations: 1	#2 Battery 30.3 Insects 6.8%
Probable Cause of Deviation: 6 offtake leaks out of 88 observed	
Response Steps Taken: Patch and seal leaks on the leaking offtakes	

L- 4081

Pushing Observations



Date

08/12/08

Battery No.

2 5 7

Start Time

0838

Observer

Jon Simpson

Finish Time

1046

Oven No.	Door Removal hh:mm:ss	Push Time		Travel Time		Door Replaced mm:ss	Duration mm:ss	Push Opacity				Travel Opacity			
		Start hh:mm:ss	End mm:ss	Start mm:ss	End mm:ss			0	15	30	45	0	15	30	45
39	38 35	40 22	1:34		1:16	2:53	2:50	0	25	30	20	5	5	0	0
	08	08	+94	94	+76	+173	170	0	0	0		0			
												Mact Avg.		7.08 %	
												IDEM Avg.		12.50 %	
41	03 47	07 09	2:00		1:06	3:29	3:06	0	5	30	20	15	15	10	10
	09	09	+120	120	+86	+209	186	20	80	35	10	10			
								10				Mact Avg.		20.00 %	
												IDEM Avg.		32.50 %	
43	19 27	22 22	1:46		1:09	2:52	2:55	0	10	25	30	0	0	0	0
	09	09	+106	106	+69	+172	175	15	0	0	0				
												Mact Avg.		6.67 %	
												IDEM Avg.		13.33 %	
45	33 39	40 15	1:42		1:04	2:44	2:46	0	5	20	20	0	0	0	0
	10	10	+102	102	+64	+164	166	10	0	0		0			
												Mact Avg.		4.58 %	
												IDEM Avg.		9.17 %	
												Mact Avg.			
												IDEM Avg.			
												Mact Avg.			
												IDEM Avg.			

Oven No. Of Door Removed Exceeding 20% Opacity Before Push

Passed (Extended) Oven Nos.:

Passed (Out of Service) Oven Nos.:

Passed (Green) Oven Nos.:

Other Comments:

Temperature

70

Wind Speed

2

Wind Direction

SE

Humidity

90%

Gas Cleaner

9121

9119

Baghouse

Door Machine: East

West



U.S. Steel Gary Works
Method 9 Criteria Determination
Pushing Observations

Date: 08/12/08

Battery No.:

2

5

7

Observer Name: Jon Simpson

Time Begin: 0839

Time End: 1046

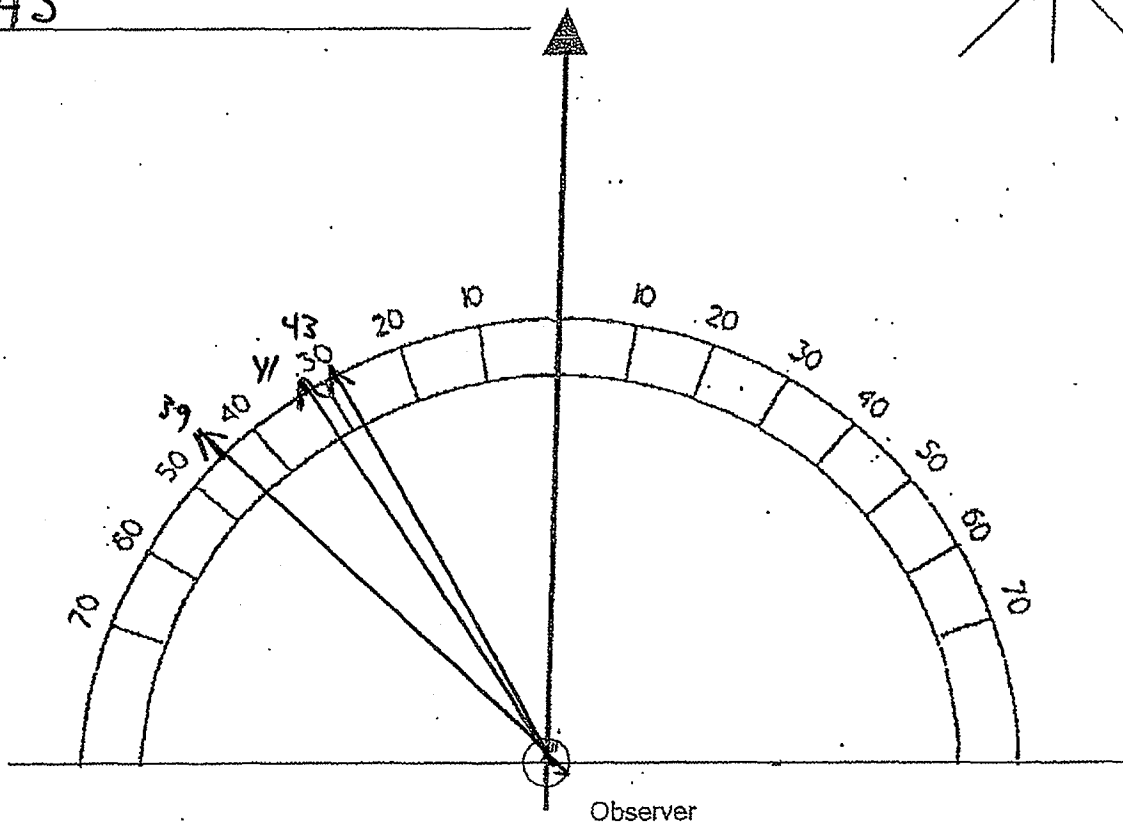
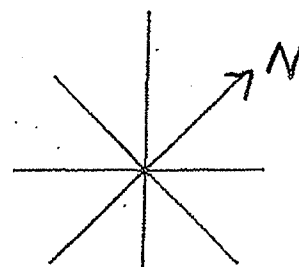


Source

Overcast

No sun visible for Push on Oven Nos.

45



Signature:

Jon Simpson



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INSPECTION SUMMARY

DATE 8-27-08 INSPECTOR C. Swallow SHIFT B

PLANT: CITIZENS GAS (Indianapolis) ☐ MITTAL (Burns Harbor) ☐ US STEEL (Gary) ☒

BATTERY NO.: 1 ☐ 2 ☒ 5 ☐ 7 ☐ E ☐ H ☐

Inspection Times		Inspection Data		Percent Leakage Calculations	
Start	Finish				
<u>1109</u>	<u>1115</u>	# Ovens Out of Service = <u>7</u>	PS Doors Leaking = <u>1</u>	No. Door Leaks No. Doors Observed	<u>2.22</u> % Leakage
		# Doors Not Observed = <u>10</u>	CS Doors Leaking = <u>1</u>	Door Inspection Limit _____% for 30 day rolling average	
		Total # Doors Obs. = <u>90</u>	Total Leaking Doors = <u>2</u>	PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
<u> </u>	<u> </u>	Total # Collector Main Leaks Observed = <u> </u>			
<u>1123</u>	<u>1127</u>	# Ovens Out of Service = <u>7</u>	Total Leaking Lids = <u>1</u>	No. Lid Leaks No. Lids Observed	<u>0.52</u> % Leakage
		# Lids Not Observed = <u>8</u>		Lid Inspection Limit _____% for 30 day rolling average	
		# Lids Observed = <u>192</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
<u>1119</u>	<u>1124</u>	# Ovens Out of Service = <u>7</u>	Total Leaking Offtakes = <u>7</u>	No. Offtake Leaks No. Offtakes Observed	<u>7.29</u> % Leakage
		# Offtakes Not Observed = <u>4</u>		Offtake Inspection Limit _____% for 30 day rolling average	
		# Offtakes Observed = <u>96</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
<u>1126</u>	<u>1238</u>	Seconds Per Charge / Oven No.	Total Seconds for Five Charges = <u>54.5</u>	Charging Inspection	
		1. <u>11.0</u> / <u>40</u>		Limit = 60 Second for five charges	
		2. <u>11.0</u> / <u>42</u>		(Log for 30 day rolling average)	
		3. <u>11.0</u> / <u>44</u>	6. <u> </u> / <u> </u>		
		4. <u>11.5</u> / <u>46</u>			
		5. <u>10.0</u> / <u>48</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	



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TOPSIDE INSPECTION (LIDS & OFFTAKES)

DATE 8-27-8

INSPECTOR Swallu

PLANT: CITIZENS GAS (Indianapolis) ☐ MITTAL (Burns Harbor) ☐ US STEEL (Gary) ☒

BATTERY NO.: 1 ☐ 2 ☒ 5 ☐ 7 ☐ E ☐ H ☐

Oven No.	OFFTAKES		LIDS					Oven No.	OFFTAKES		LIDS					Oven No.	OFFTAKES		LIDS				
	Push Side	Coke Side	1	2	3	4	5		Push Side	Coke Side	1	2	3	4	5		Push Side	Coke Side	1	2	3	4	5
1	Oes							32								63							
2								33								64							
3								34								65							
4		X						35								66							
5								36	X							67							
6								37								68							
7								38								69							
8								39								70							
9								40	O	O	O	O	O			71							
10	X			X				41								72							
11								42	O	O	O	O	O			73							
12								43								74							
13		X						44								75							
14								45	X							76							
15								46								77							
16	X							47								78							
17								48								79							
18								49								80							
19								50								81							
20								51								82							
21								52								83							
22								53								84							
23								54	Oes							85							
24		X						55								86							
25	Oes							56								87							
26								57								88							
27								58								89							
28								59								90							
29	Oes							60								91							
30								61								92							
31								62								93							

Lids Traverse:

Start Time 1125

Stop Time 1127

Total Number of Ovens 52

Maximum Time (sec) 228

Actual Time 124

Valid Run ☒ Y ☐ N

Ovens Out of Service 7

Offtakes Traverse:

Start Time 1119

Stop Time 1124

Maximum Time (sec) 298

Actual Time 247

Valid Run ☒ Y ☐ N

OFFTAKES		LIDS		Legend X = Leak OOS = Out-Of-Service O = Open
Total No. of Offtakes	<u>114</u>	Total No. of Lids	<u>228</u>	
No. of Offtakes Not Observed	<u>4</u>	No. of Lids Not Observed	<u>8</u>	
Total No. of Offtakes Observed	<u>96</u>	Total No. of Lids Observed	<u>192</u>	
No. of Offtakes Leaking	<u>7</u>	No. of Lids Leaking	<u>1</u>	

Comments: _____

**KERAMIDA**ENVIRONMENT • HEALTH • SAFETY
AIR • LAND • WATER • WASTE**INSPECTION SUMMARY**DATE 9-2-08INSPECTOR CSwallowSHIFT C+APLANT: CITIZENS GAS (Indianapolis) ☐MITTAL (Burns Harbor) ☐US STEEL (Gary) ☒

BATTERY NO.:

1 ☐2 ☒5 ☐7 ☐E ☐H ☐

Inspection Times		Inspection Data		Percent Leakage Calculations	
Start	Finish				
<u>2037</u>	<u>2032</u>	# Ovens Out of Service = <u>7</u>	PS Doors Leaking = <u>1</u>	No. Door Leaks No. Doors Observed	<u>1.14</u> % Leakage
		# Doors Not Observed = <u>12</u>	CS Doors Leaking = <u>0</u>	Door Inspection Limit _____ % for 30 day rolling average	
		Total # Doors Obs. = <u>88</u>	Total Leaking Doors = <u>1</u>	PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
		Total # Collector Main Leaks Observed = _____			
<u>2038</u>	<u>2041</u>	# Ovens Out of Service = <u>7</u>	Total Leaking Lids = <u>1</u>	No. Lid Leaks No. Lids Observed	<u>0.57</u> % Leakage
		# Lids Not Observed = <u>24</u>		Lid Inspection Limit _____ % for 30 day rolling average	
		# Lids Observed = <u>176</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
<u>2035</u>	<u>2038</u>	# Ovens Out of Service = <u>7</u>	Total Leaking Offtakes = <u>6</u>	No. Offtake Leaks No. Offtakes Observed	<u>6.82</u> % Leakage
		# Offtakes Not Observed = <u>12</u>		Offtake Inspection Limit _____ % for 30 day rolling average	
		# Offtakes Observed = <u>88</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
<u>2033</u>	<u>2032</u>	Seconds Per Charge / Oven No.	Total Seconds for Five Charges = <u>55.5</u>	Charging Inspection	
		1. <u>11.0</u> / <u>36</u>		Limit = 60 Second for five charges	
		2. <u>8.0</u> / <u>38</u>		(Log for 30 day rolling average)	
		3. <u>8.5</u> / <u>40</u>	6. _____ / _____	PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
		4. <u>10.0</u> / <u>42</u>			
		5. <u>13.0</u> / <u>44</u>			



KERAMIDA
ENVIRONMENT • HEALTH • SAFETY
AIR • LAND • WATER • WASTE

TOPSIDE INSPECTION (LIDS & OFFTAKES)

DATE 9-2-08

INSPECTOR C. Swallow

PLANT: CITIZENS GAS (Indianapolis) ☐ MITTAL (Burns Harbor) ☐ US STEEL (Gary) ☒

BATTERY NO.: 1 ☐ 2 ☒ 5 ☐ 7 ☐ E ☐ H ☐

Oven No.	OFFTAKES		LIDS					Oven No.	OFFTAKES		LIDS					Oven No.	OFFTAKES		LIDS				
	Push Side	Coke Side	1	2	3	4	5		Push Side	Coke Side	1	2	3	4	5		Push Side	Coke Side	1	2	3	4	5
1	OOS							32								63							
2								33								64							
3								34					X			65							
4		X						35								66							
5								36	O	O	-	O	O	-		67							
6								37								68							
7								38	O	O	-	-	-	-		69							
8								39								70							
9								40	G	O	-	-	-	-		71							
10								41								72							
11		X						42	O	O	-	-	-	-		73							
12								43								74							
13								44	O	O	-	-	-	-		75							
14								45	X							76							
15								46	O	O	-	-	-	-		77							
16								47								78							
17								48								79							
18								49								80							
19								50								81							
20	X	X						51								82							
21								52								83							
22								53								84							
23								54	OOS							85							
24								55								86							
25	OOS							56								87							
26								57								88							
27								58								89							
28								59								90							
29	OOS							60								91							
30	X							61								92							
31								62								93							

Lids Traverse:

Start Time 2038

Stop Time 2041

Total Number of Ovens 57

Maximum Time (sec) 238

Actual Time 123

Valid Run ☒ Y ☐ N

Ovens Out of Service 2

Offtakes Traverse:

Start Time 2035

Stop Time 2038

Maximum Time (sec) 288

Actual Time 152

Valid Run ☒ Y ☐ N

OFFTAKES		LIDS		Legend	
Total No. of Offtakes	<u>114</u>	Total No. of Lids	<u>228</u>	X = Leak	
No. of Offtakes Not Observed	<u>12</u>	No. of Lids Not Observed	<u>24</u>	OOS = Out-Of-Service	
Total No. of Offtakes Observed	<u>88</u>	Total No. of Lids Observed	<u>176</u>	O = Open	
No. of Offtakes Leaking	<u>6</u>	No. of Lids Leaking	<u>1</u>		

Comments: _____

Permit Requirement (specify permit condition #) D.2.4(e)(1) and D.2.5(c)	
Date of Deviation: 9/4/08	Duration of Deviation: Not applicable
Number of Deviations: 1	
Probable Cause of Deviation: 5 offtake leaks out of 90 observed #2 BATTERY 303 Inpt 5.6%	
Response Steps Taken: Patch and seal leaks on the leaking offtakes	

Permit Requirement (specify permit condition #) D.2.4(e)(1) and D.2.5(c)	
Date of Deviation: 9/5/08	Duration of Deviation: Not applicable
Number of Deviations: 1	
Probable Cause of Deviation: 5 offtake leaks out of 90 observed #2 BATTERY 303 Inpt 5.6%	
Response Steps Taken: Patch and seal leaks on the leaking offtakes	

Permit Requirement (specify permit condition #) C.1(a) and D.2.5(i) (See Attachment 1)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document is true, accurate and complete.

Form Completed By: Lawrence W. Sutherland
Title/Position: Division Manager, Coke Operations
Date: October 17, 2008
Phone: 219.888.4028



KERAMIDA
ENVIRONMENT • HEALTH • SAFETY
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INSPECTION SUMMARY

DATE 9-4-08

INSPECTOR C Swallow

SHIFT B

PLANT: CITIZENS GAS (Indianapolis) ☐

MITTAL (Burns Harbor) ☐

US STEEL (Gary) ☒

BATTERY NO.:

1 ☐

2 ☒

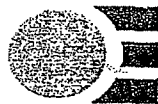
5 ☐

7 ☐

E ☐

H ☐

Inspection Times		Inspection Data		Percent Leakage Calculations	
Start	Finish				
<u>858</u>	<u>842</u>	# Ovens Out of Service = <u>2</u>	PS Doors Leaking = <u>2</u>	No. Door Leaks No. Doors Observed	<u>2</u> x 100 = Percent Leakage <u>9.33</u> % Leakage
		# Doors Not Observed = <u>10</u>	CS Doors Leaking = <u>1</u>		Door Inspection Limit _____ % for 30 day rolling average
		Total # Doors Obs. = <u>90</u>	Total Leaking Doors = <u>3</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT
		Total # Collector Main Leaks Observed = _____			
<u>849</u>	<u>851</u>	# Ovens Out of Service = <u>7</u>	Total Leaking Lids = <u>6</u>	No. Lid Leaks No. Lids Observed	<u>0</u> x 100 = Percent Leakage <u>0</u> % Leakage
		# Lids Not Observed = <u>20</u>			Lid Inspection Limit _____ % for 30 day rolling average
		# Lids Observed = <u>180</u>			PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT
<u>845</u>	<u>848</u>	# Ovens Out of Service = <u>7</u>	Total Leaking Offtakes = <u>5</u>	No. Offtake Leaks No. Offtakes Observed	<u>5.56</u> x 100 = Percent Leakage <u>5.56</u> % Leakage
		# Offtakes Not Observed = <u>10</u>			Offtake Inspection Limit _____ % for 30 day rolling average
		# Offtakes Observed = <u>90</u>			PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT
<u>1120</u>	<u>1249</u>	Seconds Per Charge / Oven No.		Charging Inspection	
		1. <u>38.5</u> / <u>21</u>		Limit = 60 Second for five charges (Log for 30 day rolling average)	
		2. <u>11.5</u> / <u>23</u>			
		3. <u>9.5</u> / <u>31</u>			
		4. <u>65.5</u> / <u>33</u>			
		5. <u>10.5</u> / <u>35</u>			
		Total Seconds for Five Charges = <u>135.5</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
		6. <u>47.5</u> / <u>37</u>			

**KERAMIDA**ENVIRONMENT • HEALTH • SAFETY
AIR • LAND • WATER • WASTE**TOPSIDE INSPECTION (LIDS & OFFTAKES)**DATE 7-4-08INSPECTOR C. SwellaPLANT: CITIZENS GAS (Indianapolis) ☐MITTAL (Burns Harbor) ☐US STEEL (Gary) ☒

BATTERY NO.:

1 ☐2 ☒5 ☐7 ☐E ☐H ☐

Oven No.	OFFTAKES		LIDS					Oven No.	OFFTAKES		LIDS					Oven No.	OFFTAKES		LIDS				
	Push Side	Coke Side	1	2	3	4	5		Push Side	Coke Side	1	2	3	4	5		Push Side	Coke Side	1	2	3	4	5
1	OOS							32								63							
2								33								64							
3		X						34								65							
4		X						35								66							
5								36								67							
6								37								68							
7								38								69							
8								39								70							
9								40								71							
10								41								72							
11	O	O	-	O	-	O		42								73							
12								43								74							
13	O	O	-	O	O	-		44								75							
14								45								76							
15	O	O	-	-	-	-		46								77							
16	X							47								78							
17	O	O	-	-	-	-		48								79							
18								49								80							
19	O	O	-	-	-	-		50								81							
20								51								82							
21								52	X							83							
22								53								84							
23								54	OOS							85							
24								55								86							
25	OOS							56	X							87							
26								57								88							
27								58								89							
28								59								90							
29	OOS							60								91							
30								61								92							
31								62								93							

Lids Traverse:

Start Time 844Stop Time 851Total Number of Ovens 57Maximum Time (sec) 228Actual Time 107Valid Run ☒ Y ☐ NOvens Out of Service 7

Offtakes Traverse:

Start Time 845Stop Time 848Maximum Time (sec) 278Actual Time 216Valid Run ☒ Y ☐ N

OFFTAKES		LIDS		Legend
Total No. of Offtakes	<u>114</u>	Total No. of Lids	<u>228</u>	
No. of Offtakes Not Observed	<u>10</u>	No. of Lids Not Observed	<u>20</u>	
Total No. of Offtakes Observed	<u>90</u>	Total No. of Lids Observed	<u>180</u>	
No. of Offtakes Leaking	<u>5</u>	No. of Lids Leaking	<u>6</u>	
				X = Leak
				OOS = Out-Of-Service
				O = Open

Comments: _____



KERAMIDA
ENVIRONMENT • HEALTH • SAFETY
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INSPECTION SUMMARY

DATE 9-5-08

INSPECTOR C. Swallow

SHIFT B

PLANT: CITIZENS GAS (Indianapolis) ☐

MITTAL (Burns Harbor) ☐

US STEEL (Gary) ☒

BATTERY NO.: 1 ☐

2 ☒

5 ☐

7 ☐

E ☐

H ☐

Inspection Times		Inspection Data		Percent Leakage Calculations	
Start	Finish				
<u>633</u>	<u>638</u>	# Ovens Out of Service = <u>8</u>	PS Doors Leaking = <u>0</u>	No. Door Leaks No. Doors Observed	<u>0</u> x 100 = Percent Leakage <u>1.08</u> % Leakage
		# Doors Not Observed = <u>5</u>	CS Doors Leaking = <u>1</u>		Door Inspection Limit ____ % for 30 day rolling average
		Total # Doors Obs. = <u>93</u>	Total Leaking Doors = <u>1</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT
		Total # Collector Main Leaks Observed = ____			
<u>627</u>	<u>629</u>	# Ovens Out of Service = <u>8</u>	Total Leaking Lids = <u>0</u>	No. Lid Leaks No. Lids Observed	<u>0</u> x 100 = Percent Leakage <u>0</u> % Leakage
		# Lids Not Observed = <u>16</u>			Lid Inspection Limit ____ % for 30 day rolling average
		# Lids Observed = <u>180</u>			PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT
<u>622</u>	<u>626</u>	# Ovens Out of Service = <u>8</u>	Total Leaking Offtakes = <u>5</u>	No. Offtake Leaks No. Offtakes Observed	<u>5</u> x 100 = Percent Leakage <u>5.56</u> % Leakage
		# Offtakes Not Observed = <u>8</u>			Offtake Inspection Limit ____ % for 30 day rolling average
		# Offtakes Observed = <u>90</u>			PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT
<u>919</u>	<u>1047</u>	Seconds Per Charge / Oven No.	Total Seconds for Five Charges = <u>78.5</u>	Charging Inspection	
		1. <u>17.5</u> / <u>16</u>		Limit = 60 Second for five charges	
		2. <u>10.0</u> / <u>18</u>		(Log for 30 day rolling average)	
		3. <u>13.0</u> / <u>30</u>	6. ____ / ____		
		4. <u>21.5</u> / <u>32</u>			
		5. <u>16.5</u> / <u>34</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	



KERAMIDA
ENVIRONMENT • HEALTH • SAFETY
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TOPSIDE INSPECTION (LIDS & OFFTAKES)

DATE 9-5-08

INSPECTOR Swallow

PLANT: CITIZENS GAS (Indianapolis) ☐ MITTAL (Burns Harbor) ☐ US STEEL (Gary) ☒

BATTERY NO.: 1 ☐ 2 ☒ 5 ☐ 7 ☐ E ☐ H ☐

Oven No.	OFFTAKES		LIDS					Oven No.	OFFTAKES		LIDS					Oven No.	OFFTAKES		LIDS				
	Push Side	Coke Side	1	2	3	4	5		Push Side	Coke Side	1	2	3	4	5		Push Side	Coke Side	1	2	3	4	5
1	OOS							32	O	G						63							
2								33	X	G						64							
3		X						34								65							
4								35								66							
5								36								67							
6	O	O						37								68							
7								38								69							
8	O	O						39								70							
9	X	X						40								71							
10								41								72							
11								42								73							
12	O	O						43		X						74							
13								44								75							
14								45								76							
15								46								77							
16								47								78							
17								48								79							
18								49								80							
19								50								81							
20								51								82							
21	OOS							52								83							
22								53								84							
23								54	OOS							85							
24								55								86							
25	OOS							56								87							
26								57								88							
27								58								89							
28								59								90							
29	OOS							60								91							
30								61								92							
31								62								93							

Lids Traverse:

Start Time 627 Stop Time 629

Total Number of Ovens 52

Maximum Time (sec) 228 Actual Time

106 Valid Run ☒ Y ☐ N

Ovens Out of Service 8

Offtakes Traverse: Start Time 622 Stop Time 626

Maximum Time (sec) 278 Actual Time 257 Valid Run ☒ Y ☐ N

OFFTAKES		LIDS		Legend	
Total No. of Offtakes	<u>114</u>	Total No. of Lids	<u>228</u>	X = Leak	
No. of Offtakes Not Observed	<u>8</u>	No. of Lids Not Observed	<u>16</u>	OOS = Out-Of-Service	
Total No. of Offtakes Observed	<u>90</u>	Total No. of Lids Observed	<u>180</u>	O = Open	
No. of Offtakes Leaking	<u>5</u>	No. of Lids Leaking	<u>0</u>		

Comments: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: U.S. Steel – Gary Works
Source Address: One North Broadway, Gary, Indiana 46402
Mailing Address: One North Broadway, Gary, Indiana 46402
Part 70 Permit No.: T089-7663-00121

Months: October 1 to December 31 Year: 2008

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input checked="" type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
Permit Requirement (specify permit condition #) D.2.4(a), D.2.5(e)	
Date of Deviation: 12/20/08	Duration of Deviation: Not applicable
Number of Deviations: 1	<i>#5 Battery 303 Dept</i>
Probable Cause of Deviation: 17 Door leaks out of 142 observed	<i>120°/h</i>
Response Steps Taken: Sealed leaks on the leaking doors	
Permit Requirement (specify permit condition #) C.1(a) and D.2.5(i) (See Attachment 1)	
Date of Deviation:	Duration of Deviation: Not applicable
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

**KERAMIDA**ENVIRONMENT • HEALTH • SAFETY
AIR • LAND • WATER • WASTE**INSPECTION SUMMARY**DATE 12-20-08INSPECTOR C. SwallowSHIFT B

PLANT: CITIZENS GAS (Indianapolis)

☐

MITTAL (Burns Harbor)

☐

US STEEL (Gary)

☒

BATTERY NO.:

1 ☐2 ☐5 ☒7 ☐E ☐H ☐

Inspection Times		Inspection Data		Percent Leakage Calculations	
Start	Finish				
<u>880</u>	<u>905</u>	# Ovens Out of Service = <u>6</u>	PS Doors Leaking = <u>10</u>	No. Door Leaks No. Doors Observed	x 100 = Percent Leakage <u>11.97</u> % Leakage
		# Doors Not Observed = <u>0</u>	CS Doors Leaking = <u>7</u>	Door Inspection Limit ____ % for 30 day rolling average	
		Total # Doors Obs. = <u>142</u>	Total Leaking Doors = <u>17</u>	PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
		Total # Collector Main Leaks Observed = _____			
<u>1030</u>	<u>1032</u>	# Ovens Out of Service = <u>6</u>	Total Leaking Lids = <u>0</u>	No. Lid Leaks No. Lids Observed	x 100 = Percent Leakage <u>0</u> % Leakage
		# Lids Not Observed = <u>9</u>		Lid Inspection Limit ____ % for 30 day rolling average	
		# Lids Observed = <u>204</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
<u>1038</u>	<u>1030</u>	# Ovens Out of Service = <u>6</u>	Total Leaking Offtakes = <u>1</u>	No. Offtake Leaks No. Offtakes Observed	x 100 = Percent Leakage <u>0.74</u> % Leakage
		# Offtakes Not Observed = <u>6</u>		Offtake Inspection Limit ____ % for 30 day rolling average	
		# Offtakes Observed = <u>136</u>		PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	
<u>1040</u>	<u>1141</u>	Seconds Per Charge / Oven No. 1. <u>2.0</u> / <u>61</u> 2. <u>9.5</u> / <u>3</u> 3. <u>4.5</u> / <u>13</u> 4. <u>1.5</u> / <u>18</u> 5. <u>2.0</u> / <u>23</u>	Total Seconds for Five Charges = <u>18.5</u> 6. _____ / _____	Charging Inspection Limit = 60 Second for five charges (Log for 30 day rolling average)	
				PRELIM. COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> OUT	

**KERAMIDA**ENVIRONMENT • HEALTH • SAFETY
AIR • LAND • WATER • WASTE**COKE OVEN DOOR EMISSIONS INSPECTION**DATE 12/20/05INSPECTOR SwallowPLANT: CITIZENS GAS (Indianapolis) ☐ MITTAL (Burns Harbor) ☐ US STEEL (Gary) ☒BATTERY NO.: 1 ☐ 2 ☐ 5 ☒ 7 ☐ E ☐ H ☐

Oven No.	Push Side	Coke Side
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12	X	
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		X
23		
24		
25		
26		
27		
28		
29		
30		
31		

Oven No.	Push Side	Coke Side
32		
33		
34		
35		
36	OOS	-
37		-
38	OOS	-
39		
40	X	
41		
42		
43		
44		
45		
46		
47	X	
48		
49		
50	OOS	-
51	OOS	-
52	X	X
53		
54	X	X
55	X	X
56		
57		
58	OOS	-
59		
60	X	X
61		
62		

Oven No.	Push Side	Coke Side
63		
64		
65	X	
66		
67		
68		
69		
70	X	X
71		
72		
73		
74		
75	X	X
76		
77		
78		
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81		
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83		
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85		
86		
87		
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89		
90		
91		
92		
93		

Push Side Traverse:

Start Time 856Stop Time 857Maximum Time (sec) 408Actual Time 87Valid Run ☒ Y ☐ N

Coke Side Traverse:

Start Time 903Stop Time 905Maximum Time (sec) 300Actual Time 113Valid Run ☒ Y ☐ NTotal Number of Ovens 77Ovens Out of Service 6Total Number of Doors 154Number of Doors Not Observed 0Total Number of Doors Observed 154Back Pressure: cm 455 pw 446cc 611 pw 593

Comments:

Legend

X = Leak

OOS = Out-Of-Service

BL = Blocked

O = Off

SummaryPush Side Door Leaks 10Coke Side Doors Leaks 7

IDEM AIR COMPLIANCE BRANCH HIGH PRIORITY VIOLATION CHECKSHEET

Deliberative-Not for Public View per IC 5-14-3-4(b) (6)

Directions: Please complete the gray portions for any violation. Then complete Sections B, C, D if "yes" to Section A.1 or Section A.2.

Source and Permit ID # US Steel 089-00121	Source Name US Steel Gary Works	Inspector Name Dave Sampias
Date of Violation 3 rd & 4 th Qtr 2008	Date violation was discovered 3 rd & 4 th Qtr 2008	How discovered (Select One) <i>Record Review</i>
Section A.		YES
NO		
A1. (a.) Did this violation occur at a major CAA source (Title V source)?		<input checked="" type="checkbox"/>
(b.) Did this violation relate to a pollutant for which this source is major?		<input checked="" type="checkbox"/>
A2. (a.) Did this violation occur at a synthetic minor (FESOP or SSOA)?		<input type="checkbox"/>
(b.) Did this violation affect the synthetic minor's status as a minor?		<input type="checkbox"/>
<p>Directions:</p> <p><i>If "Yes" to Section A1.(a.) and A1.(b.) move on to Section B General Criteria below or;</i></p> <p><i>If "Yes" to Section A2.(a.) and A2.(b.), move on to Section B General Criteria below.</i></p> <p><u>If "No" to both Section A1 and Section A2 this is not a High Priority Violation. STOP at this point!</u></p> <p><i>(Note: But if you wish to make an argument for a special case HPV, you may move down to Section D)</i></p>		
Section B. General Criteria		YES
NO		
B1. Did the source fail to obtain PSD permit (and/or to install BACT), an NSR permit (and/or install LAER/ obtain offsets) and/or major permit modification?		<input type="checkbox"/>
B2. Was this a violation of air toxics requirement (NESHAP, MACT) that resulted in excess emissions or violated an operating parameter restriction?		<input checked="" type="checkbox"/>
B3. Did this violation affect the synthetic minor source's PSD, NSR or Title V status? (i.e. Failed to comply with permit that limits PTE? Explain in notes in Section E.)		<input type="checkbox"/>
B4. Was this a violation of a substantive term of local, state or federal enforcement order or decree?		<input type="checkbox"/>
B5. Was this a substantial violation of a Title V Annual Compliance Certification? (i.e. Failed to submit a certification?)		<input type="checkbox"/>
B6. Did the source fail to submit a Title V permit application?		<input type="checkbox"/>
B7. Was this a violation of testing, monitoring, recordkeeping, or reporting that substantially interfered with enforcement of determining the source's compliance with an applicable emission limit?		<input type="checkbox"/>
B8. Was this a violation of an allowable emission limit during a stack test? (i.e. Failed by any margin?)		<input type="checkbox"/>
B9. Was this a violation by a chronic or recalcitrant violator?		<input checked="" type="checkbox"/>
B10. Was this a substantial violation of section 112(r)? (i.e. Failed to submit a Risk Management Plan?)		<input type="checkbox"/>
<p>Directions:</p> <p><i>If "Yes" to Section A1.(a) and A1.(b) or "yes" to Section A2.(a) and A2.(b) AND any one of the ten General Criteria in Section B(above), this violation qualifies as a HPV and must be reported. (Now skip to Section E.)</i></p> <p><i>If none of the choices in Section B General Criteria apply, complete Section C on page two (over).</i></p>		

Page Two IDEM AIR COMPLIANCE BRANCH HIGH PRIORITY VIOLATION CHECKSHEET

Section C. Matrix Criteria

<i>Violation</i>	<i>Method of Detection</i>	<i>Standard</i>	<i>Supplemental Significant Threshold¹</i>	<i>% in Excess of Reference Limit/Parameter</i>	YES	NO
C1. Was this a violation of Allowable Emissions Limitations?	Stack Testing	Any applicable requirement		Any violation of the applicable standard	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Coatings analysis, fuel samples, other process materials sampling or raw/process materials usage reports.	Any applicable requirement	CO 23 lb/hr NOx 9 lb/hr SO ₂ 9 lb/hr VOC 9 lb/hr PM 6 lb/hr PM ₁₀ 3 lb/hr	>15% of the applicable emission limitation or the supplemental significant threshold (Whichever is more stringent.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C2. Was this a violation of parameter limits where the parameter is a direct surrogate for an emissions limitation?	Continuous/ Periodic Parameter Monitoring (includes indicators of control device performance)	Any applicable requirement		>5% of the applicable parameter limit ³	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C3. Was this a violation of an applicable non-opacity Standard?	Continuous Emissions Monitoring (where the CEM is certified under federal performance specifications.	≤24 hour averaging period (for example, one hour or three hour blocks	CO 23 lb/hr NOx 9 lb/hr SO ₂ 9 lb/hr VOC 9 lb/hr	15% of the applicable standard or, the supplemental significant threshold (whichever is the more stringent)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Continuous Emissions Monitoring (where the CEM is certified under federal performance specifications	>24 hr averaging period		Any violation of the applicable standard	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C4. Was this a violation of an applicable opacity standard? ²	Continuous Opacity Monitoring	0-20% opacity >20% opacity		>5% opacity over the limit >10% opacity over the limit	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Method 9 VE Readings	0-20% opacity		>50% over the limit	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		> 20% opacity		>25% over the limit	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Table Footnotes:

1. Supplemental Significant Threshold is based on PSD significant levels. The Significant Threshold value is the lb/hr rate at 8760 hours which would result in PSD review.
2. Based on the applicable averaging period (e.g. 6-minute block averages)
3. For the first reporting period. If exceedances occur for more than 25% of the operating time during the first reporting period evaluated, and if such exceedance continues during the subsequent consecutive reporting period, the exceedances will be considered.

Directions:

If "yes" to Section A1.(a) and A1.(b) or "yes" to Section A2.(a) and A2.(b) AND any one of the criteria in Section C (above), this violation qualifies as a HPV and must be reported. Now move on to Section E.

If "no" to choices in Section A and Section B or Section A and Section C, you may select Section D.

Page Three IDEM AIR COMPLIANCE BRANCH HIGH PRIORITY VIOLATION CHECKSHEET

Section D. Discretionary HPV:	YES	NO
1. Should this violation be on the HPVL based on other factors? If Yes, complete D.2.	<input checked="checked" type="checkbox"/>	<input type="checkbox"/>
2. Provide justification for the discretionary recommendation to include violations as HPV if not listed previously in Section B or Section C. Include duration, magnitude, environmental, or human health impact of the violation(s).		

Section E Summary: Is this violation a High Priority Violation?	YES	NO
Are any questions in Section A <u>and</u> Section B, Section C or Section D answered "Yes"? If "Yes" to the question above the violation is a HPV. If "No" to the question above the violation is not a HPV.	<input checked="checked" type="checkbox"/>	<input type="checkbox"/>
Additional Comments:		